REMS Program Policy for submitting of PII information Effective immediately 05/13/09

In August 2006, the Deputy Director of the Office of Security and Safety Performance Assurance issued a memorandum entitled "Protection of Electronic Data Containing Controlled Unclassified Information (CUI)". In November of 2006, DOE CIO issued Guidance CS-38A, "Protection of Sensitive Unclassified Information, including Personally Identifiable Information". These documents delineate controls necessary to protect sensitive categories of information. A review of the Office of Health, Safety and Security (HSS) systems has identified that the radiation exposure records submitted to the Radiation Exposure Monitoring System (REMS) under DOE Order 231.1A and DOE Manual 231.1-1A are subject to protections under this policy.

After reviewing the policy for receiving and processing of radiation exposure records containing PII, the Office of Corporate Safety Analysis (HS-30) has refined the requirements for submitting data to REMS. In the past, sending data files on removable media or via Entrust-encrypted emails were acceptable, these submittal methods are no longer acceptable. While these methods offer protections in accordance with the Privacy Act, there are still opportunities for the loss or compromise of data which represent an unnecessary risk. Recent events where a CD was lost by an express courier and where an e-mail was accidentally sent without proper encryption highlight the weakness in these submission methods.

Therefore, the only acceptable method for submitting data is via the secure web page that has been established in collaboration with the U.S. Nuclear Regulatory Commission (NRC). The web site for occupational radiation exposure has a module that allows users to submit a data file using Secure Socket Layers (SSL) to encrypt the data file and protect it in transit to the radiation records repository. The DOE and NRC have an inter-agency agreement to share resources and technology in radiation exposure information including submitting data files to both the DOE and NRC.

You can go directly to the web submittal form at: https://www.reirs.com/submit/submitdata.cfm

If you have any questions about completing the form, contact Derek Hagemeyer at ORAU at (865) 241-3615, or by email at <u>derek.hagemeyer@orise.orau.gov</u>. Questions about this policy or regulatory issues should be directed to Nimi Rao at DOE at <u>nimi.rao@hq.doe.gov</u>.

The policy becomes effective immediately and replaces the current policy dated 03/28/07. For more information on the REMS database and reporting radiation exposure records, visit the web site at: http://www.hss.energy.gov/csa/csp/rems/